

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

**In Re: Gerald R. Galleshaw
Debtor**

DAVID C. FRAIOLI and NEW ENGLAND AUTO CENTER, INC.	:	
Plaintiffs	:	C.A. NO. 15-11047
V.	:	Chapter 7
GERALD R. GALLESASHAW	:	ADV. PRO. NO.: 15-01023
Defendant Debtor	:	

**DEFENDANT DEBTOR'S OBJECTION TO
PLAINTIFF'S MOTION TO HOLD IN CONTEMPT**

Now comes Defendant Debtor and objects to the Plaintiff's Motion to hold Defendant Debtor in Contempt. As grounds therefore, Defendant Debtor states that on January 22nd, 2016, he hand delivered the requested documents in Plaintiff's Request for Production to Plaintiff's Attorney Ryanna T. Capalbo, Esq., Bilodeau Carden, LLC, 51 Jefferson Boulevard, Suite 2, Warwick, RI 02888. Proof of receipt of Defendant Debtor's Response is attached hereto.

Therefore, Defendant Debtor respectfully request this honorable court deny Plaintiff's Motion to Hold in Contempt.

Respectfully submitted,
Debtor, Gerald Galleshaw,
By his attorney

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2016, a copy of above Objection with Exhibits filed through the CM/ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies were served by hand delivery on the following affected parties:

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/s/ Todd S. Dion